

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JASON PRINGLE,

Plaintiff,

vs.

STANDARD INSURANCE COMPANY,

Defendant.

NO.

COMPLAINT FOR LONG TERM  
DISABILITY BENEFITS

COMES NOW plaintiff, Jason Pringle, with a complaint for Long-Term Disability benefits and states and alleges as follows:

I. IDENTIFICATION OF PLAINTIFF

1.1 At all times material herein, plaintiff was resident of Pierce County, Washington, and was a beneficiary, participant and insured under a Long Term Disability plan covered by the Employee Retirement Income Security Act of 1974 (ERISA).

II. IDENTIFICATION OF DEFENDANT

2.1. At all times material herein, defendant, Standard Insurance Company, administered an employee welfare benefit plan governed by ERISA. The Plan is sponsored by plaintiff's employer CenturyLink. Benefits under the Plan are funded through an insurance policy with defendant, Standard Insurance Company, under Group Policy No. 648848-B. The policy was issued in Colorado, effective January 1, 2015.

III. FACTS

- 3.1 Plaintiff made application for Long-Term Disability benefits under the Plan with defendant, Standard Insurance Company, with a cease work date of April 10, 2016. Defendant approved the claim and paid benefits.
- 3.2 On November 29, 2017, defendant terminated benefits effective April 17, 2017.
- 3.2 Plaintiff has exhausted his administrative remedies.

IV. CAUSE OF ACTION

- 4.1 Plaintiff brings this action under 29 U.S.C. § 1132(a)(1)(B) to recover Long-Term Disability benefits under an employer sponsored welfare plan.

V. RELIEF REQUESTED

- 5.1 Plaintiff requests that this Court order entitlement to Long-Term Disability benefits with payment of benefits that have accrued, award of attorney fees and costs, and any other relief the court deems just and equitable in the premises.
- 5.2 Plaintiff requests that this court require defendants to answer this complaint and supply the court with copies of the administrative record, the Summary Plan Description, and the applicable insurance policy.

DATED this 11<sup>th</sup> day of January, 2018.

TODD R. RENDA, ATTORNEY AT LAW

s/Todd R. Renda

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